

REMARKS

In the Official Action, claims 1-14 and 20-25 were rejected. By this response, claims 1, 2, 12, 20, 21, 23, and 25 have been amended. Upon entry of the amendments, claims 1-14 and 20-25 will remain pending in the present application. Reconsideration of the rejection and allowance of the pending claims are respectfully requested.

Objections to the Drawings

The drawings were objected to under 37 CFR 1.83(a). Specifically, the Examiner stated:

The drawings must show every feature of the invention specified in the claims. Therefore, the "a single motor" "a continuous stator" and "a single end coil section" must be shown or the feature(s) cancelled from the claim(s). No new matter should be entered.

Applicants respectfully traverse the objection. All of the features recited by the Examiner are illustrated in the drawings. The terms "a single motor," "a continuous stator," and "a single end coil section" have been amended and/or deleted from the claims. Withdrawal of the objection is respectfully requested.

Rejection Under 35 U.S.C. § 112

In the Official Action, claims 21 and 22 were rejected under 35 U.S.C. §112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Specifically, the Examiner stated that: "The phrase 'a continuous linear stator' cited in claim 2, 20 and 23, and 'a single end coil section' cited in claim 12." As discussed above, the terms "a continuous linear stator" and "a single end coil section" have been amended and/or deleted from the claims. Withdrawal of the rejection is respectfully requested.

Rejection Under 35 U.S.C. § 102(b)

In the Official Action, claims 1, 2, 7-13, and 20-25 were rejected under 35 U.S.C. §102(b) as being anticipated by Ekstromer, U.S. Patent No. 1,960,484. Independent claims 1, 12, and 23 have been amended by this response to further clarify their recitations. Claims 1, 2, 7-13, and 20-25 are not anticipated because the Ekstromer reference does not disclose all of the recited features of the claims.

Some of the recited features of amended independent claim 1 that are not shown by the Ekstromer reference are "a bottom motor section electrically coupleable to one of the plurality of modular motor sections to electrically couple the modular stator sections together to form a stator." The Ekstromer reference discloses a *plurality of motors* 17 that are assembled together to form a motive power driving unit 16. See Ekstromer, page 2, lines 45-48. Each of the motors 17 of the Ekstromer reference is a complete fractional horsepower polyphase induction motor. See Ekstromer, page 2, lines 45-48. The bottom motor 17 of the Ekstromer reference may be removed and the remaining motors 17 remain electrically coupled together to form a motive driving unit 16. Indeed, any of the motors 17 of the Ekstromer reference may be removed and the remaining motors 17 coupled together to form the motive driving unit 16. Therefore, the Ekstromer reference does not disclose "a bottom motor section electrically coupleable to one of the plurality of modular motor sections to electrically couple the modular stator sections together to form a stator." Thus, the Ekstromer reference does not anticipate claim 1. Claims 2, 7-11, 20 and 21 depend from independent claim 1. Therefore, these claims also are not anticipated by the Ekstromer reference.

In addition, some of the recited features of amended independent claim 12 that are not shown by the Ekstromer reference are "a bottom motor section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the bottom motor section." As discussed above, the Ekstromer reference discloses a plurality of individual motors 17 coupled together to form a drive unit 16. Each of the items labeled in Fig. 2 and identified in the specification as a stator winding 23 is an end coil. The end coils couple the stator windings located on one side of the stator to the stator windings located on the other side of the stator. Thus, each motor 17 of the Ekstromer reference has a

complete stator. The bottom motor 17 of the Ekstromer reference may be removed and the remaining motors 17 will still have their complete stators disposed therein. In addition, the motors 17 will remain electrically coupled together. Indeed, as discussed above, any of the motors 17 of the Ekstromer reference may be removed and the remaining motors 17 may be coupled together to form the motive driving unit 16. Therefore, the Ekstromer reference does not disclose "a bottom motor section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the bottom motor section." Claim 13 depends from claim 12. Therefore, claim 13 also is not anticipated by the Ekstromer reference.

Furthermore, some of the recited features of amended independent claim 23 that are not shown by the Ekstromer reference are: "a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a motor of a desired length, each motor section including a modular rotor section and a modular stator section having conductors extending longitudinally therethrough to produce a rotating magnetic field to impart rotative motion in a rotor disposed therein." The windings 23 of the Ekstromer reference do not extend longitudinally therethrough. Rather, the 23 windings of each motor 17 are coiled within each motor 17. Therefore, the Ekstromer reference does not disclose all of the recited features of claim 23. Thus, claim 23 is not anticipated by the Ekstromer reference. Claims 24 and 25 depend from independent claim 23. Therefore, claims 23 and 24 also are not anticipated by the Ekstromer reference.

For all of these reasons, claims 1, 2 and 7-13 are not anticipated by the Ekstromer reference. Withdrawal of the rejection and allowance of claim 1, 2, 7-13, and 20-25 are respectfully requested.

Rejection Under 35 U.S.C. § 103

Claims 3-5 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ekstromer in view of Schob, U.S. Patent No. 5,939,813. Claims 3-5 and 14 are patentable because the cited references, either alone or in combination, do not teach, suggest, or disclose all

of the recited features of the claims. Claims 3-5 depend from independent claim 1 and claim 14 depends from independent claim 12. As discussed above, the Ekstromer reference does not disclose all of the recited features of amended independent claims 1 and 12. The Schob reference does not obviate the deficiencies of the Ekstromer reference in failing to suggest, disclose, or teach all of the recited features of independent claims 1 and 12. Thus, claims 3-5 and 14 are patentable by virtue of their dependence from independent claims 1 and 14. In addition, claims 3-5 and 14 are patentable by virtue of their own recited subject matter. Withdrawal of the rejection and allowance of claims 3-5 and 14 are respectfully requested.

Attachment

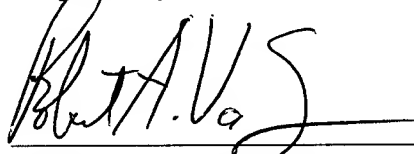
Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is entitled "VERSION WITH MARKINGS TO SHOW CHANGES MADE."

Conclusion

In view of the above remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Date: November 12, 2002

Respectfully submitted,



Robert A. Van Someren
Reg. No. 36,038
Fletcher, Yoder & Van Someren
P.O. Box 692289
Houston, TX 77269-2289
(281) 970-4545



VERSION WITH MARKINGS TO SHOW CHANGES MADE

Please amend claims 1-5 and 12-14 as follows:

1. (Twice Amended) An electric motor, comprising:

a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable ~~to form a single motor of a desired length~~, each motor section including a modular rotor section and a modular stator section; and

a bottom motor section electrically coupleable to one of the plurality of modular motor sections to electrically couple the modular stator sections together to form a stator.

2. (Twice Amended) The electric motor as recited in claim 1, wherein the plurality of motor sections includes:

a first motor section having a first modular rotor section and a first modular stator section; and

a second motor section having a second modular rotor section coupleable to the first modular rotor section and a second modular stator section electrically coupleable to the first stator section ~~to form a single continuous linear stator~~, wherein electricity flowing through the first and second modular stator sections produces a magnetic field to impart rotative motion in the rotor.

12. (Second Amended) A submersible pumping system, comprising:

a submersible electric motor, comprising:

a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a motor of a desired length, each motor section comprising:

a modular rotor section coupleable to an adjacent modular rotor section of an adjacent motor section to form a rotor; and

a modular stator section coupleable to an adjacent modular stator section of the adjacent motor section; and

a ~~single end coil~~ bottom motor section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the ~~single end coil~~ bottom motor section; and

a submersible pump drivingly coupled to the rotor of the submersible electric motor.

20. (Amended) The electric motor as recited in claim 2, comprising a ~~single end coil~~ third motor section adapted to complete electrically the single stator formed by the first modular stator section and the second modular stator section.

21. (Amended) The electric motor as recited in claim 1, wherein each modular stator section comprises a first stator winding extending linearly through the modular stator section to ~~form a continuous linear stator with~~ a second stator winding extending linearly through an adjacent modular stator section.

23. (Amended) An electric motor, comprising:

a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a motor of a desired length, each motor section including a modular rotor section and a modular stator section having conductors extending longitudinally therethrough to produce a rotating magnetic field to impart rotative motion to a rotor disposed therein ~~adapted to form a continuous linear stator.~~

25. (Amended) The electric motor as recited in claim 23, comprising a ~~single end~~ bottom motor section adapted to complete electrically the modular stator sections.